CAMP MINDEN (EXPLO SYSTEMS, INC.)

QUESTION: What is EPA doing to ensure that the explosive materials located at Camp Minden, Louisiana are expeditiously addressed and that another explosion at the site does not occur?

ANSWER:

- EPA is working closely with the Louisiana Military Department (LMD), Louisiana Department of Environmental Quality (LDEQ), Louisiana State Police (LSP), and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) to address the 18 M pounds of explosive risk posed by the potentially unstable explosives stored at Camp Minden.
- EPA negotiated two Administrative Orders on Consent (AOCs) with private parties to remove approximately 3 M lbs. of explosives stored at Camp Minden. The removal action began in April 2014. Approximately 184,000 lbs. of nitrocellulose and 36,750 lbs. of pit powder have been processed and shipped for disposal offsite. The removal of the 3 M lbs of explosives is anticipated to be completed before June 2015.
- On March 18, 2014, when negotiations failed, EPA issued a Unilateral Order under RCRA 7003 to the Department of the Army to address the 15 M lbs. of M6 propellant onsite. The Army challenged the order and their response is now under review.
- On February 19, 2014 EPA provided a draft Administrative Order under Section 106 of CERCLA to
 the Louisiana Military Department to address the 15M pounds of M6 propellant. On April 15, 2014
 the State responded with a proposal that supported the need to address the material.
 Unfortunately, the LMD does not have sufficient resources to fully address all of the propellant.
 EPA is reviewing the LMD response.

QUESTION: Why do you think the Army is liable for material at Camp Minden?

ANSWER:

The Army is liable under Section 7003 of RCRA because the Army has contributed to or is contributing to the past or present handling, storage, and/or disposal of solid waste and/or hazardous waste that may present an imminent and substantial endangerment to health or the environment. Specifically, the actions and the lack of oversight by the Army contributed to the improper handling and storage of approximately 15 million pounds of M6 propellant. The improper storage and handling increased the rate of the degradation of the stabilizers in the M6 propellant and compromised propellant lot integrity. The M6 propellant became a solid waste after it accumulated onsite and was not actively being recycled, and as a result of its improper handling and storage. In addition, at the time the M6 propellant had accumulated for a sufficient length of time to be considered discarded, subsequent shipments of the artillery charges to Explo are considered discarded and therefore a solid waste.

QUESTION: What is the State of Louisiana doing about the problems at Camp Minden?

ANSWER: On June 3, 2014, The Louisiana Department of Environmental Quality issued an Administrative Order to the Department of the Army requiring the Army to comply with the RCRA 7003 UAO issued by the EPA on March 18, 2014.

QUESTION: Why is the M6 and other explosives a problem?

ANSWER: Approximately 18 M lbs. of potentially unstable explosives currently pose an explosive risk although it is stored in magazines. On June 20, 2013, the DOD Explosives Safety Board (DDESB) cited concerns with the deteriorating stability of the M6 Propellant and recommended disposal of the materials. Based on the risk of auto-ignition and explosion of the M6 Propellant and the DDESB recommendations, EPA Region 6 notified all PRPs that the removal of the explosives at Camp Minden is needed by August 2015, to prevent another magazine explosion. A minimum of 12-14 months is required to dispose of explosives onsite.

QUESTION: How much will it cost to address the explosive materials located at Camp Minden?

ANSWER: Approximately \$30 M

BACKGROUND

- On October 15, 2012, an explosion of an explosive magazine at Camp Minden, Louisiana (the former Louisiana Army Ammunition Plant), prompted attention from EPA Region 6, LSP, LDEQ, ATF, and national media.
- The explosion was caused by explosives formerly owned by Explo Systems, Inc. Explo was required to demilitarize and dispose of military munitions and materials under a Department of Defense (DOD) contract. Investigations revealed that Explo was illegally and improperly storing approximately 10 M pounds of explosive materials (M6 propellant) throughout the facility, creating an imminent and substantial endangerment to human health and the environment. Note: There is a total of 18 M pounds of explosives stored at the site.
- In September 2013, the Governor of the State of Louisiana declared a state of emergency at Camp Minden and has reissued the proclamation keeping a continuous declaration of emergency at the site.
- Since August 2013, EPA Region 6 and Federal Facilities Office have attempted to negotiate Site clean-up actions with the PRPs, including the US Army, through official correspondence, General Notice Letters, and AOCs.